

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION

EAUX HOLDINGS, LLC

VERSUS

SCOTTSDALE INSURANCE CO.

CIVIL CASE NO. 2:20-CV-01582

*Jury Trial*

JUDGE JAMES CAIN

MAG. JUDGE KATHLEEN KAY

---

***EX PARTE MOTION FOR LEAVE TO FILE SUR-REPLY MEMORANDUM IN  
OPPOSITION TO MOTION TO COMPEL DEPOSITION OF MONTE JONES***

NOW INTO COURT, through undersigned counsel, comes Defendant, Scottsdale Insurance Company (“Scottsdale”), who respectfully requests leave to file the Sur-Reply Memorandum in Opposition to the Motion to the Motion to Compel Deposition of Monte Jones filed by Plaintiff, Eaux Holdings, LLC.<sup>1</sup> Good cause exists for leave of court to allow Scottsdale to file its Sur-Reply to address Plaintiff’s Reply Memorandum, particularly Plaintiff’s request to continue the trial date. No good cause exists to continue the trial in this matter. Pursuant to Local Rules 7.4.1, counsel for Scottsdale conferred with counsel for Plaintiff regarding its consent to this instant motion. Counsel for Plaintiff indicated it opposes this instant Motion for Leave.

WHEREFORE, Defendant prays that this Motion be granted, and that the attached Sur-Reply Memorandum in Opposition to Motion to Compel Deposition of Monte Jones be filed into the record.

---

<sup>1</sup> The Sur-Reply Memorandum is attached herein as **Exhibit A**.

RESPECTFULLY SUBMITTED,

**KEOGH, COX & WILSON, LTD.**

BY: /s / John P. Wolff, III  
JOHN P. WOLFF, III (Bar #14504)  
MARY ANNE WOLF (26556)  
VIRGINIA J. McLIN (31257)  
RICHARD W. WOLFF (34844)  
JENNIFER R. DIETZ (33804)  
CHELSEA A. PAYNE (35952)  
SYDNEE D. MENOU (35913)  
COLE C. FRAZIER (38743)  
701 Main Street  
Baton Rouge, La 70802  
Telephone: 225-383-3796  
Facsimile: 225-343-9612  
Email: [jwolff@keoghcox.com](mailto:jwolff@keoghcox.com)  
[mwolf@keoghcox.com](mailto:mwolf@keoghcox.com)  
[jmclin@keoghcox.com](mailto:jmclin@keoghcox.com)  
[jdietz@keoghcox.com](mailto:jdietz@keoghcox.com)  
[rwluff@keoghcox.com](mailto:rwluff@keoghcox.com)  
[cpayne@keoghcox.com](mailto:cpayne@keoghcox.com)  
[smenou@keoghcox.com](mailto:smenou@keoghcox.com)  
[cfrazier@keoghcox.com](mailto:cfrazier@keoghcox.com)

*Counsel for Defendant, Scottsdale  
Insurance Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on this **16<sup>th</sup> day of September**, a copy of the foregoing *Ex Parte* Motion for Leave to File Sur-Reply Memorandum in Opposition to Motion to Compel Deposition of Monte Jones was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the court's electronic filing system to all counsel of record. I also certify that there are no known manual recipients.

---

/s / John P. Wolff, III  
JOHN P. WOLFF, III